

3. Between September 12, 2014, and the present, the parties have engaged in settlement discussions and are currently scheduled for a mediation session for December 2, 2014, in an attempt to resolve both the underlying litigation and this case.

4. In the interests of judicial economy, GCAC requests that the Court extend the time for GCAC to respond to Plaintiff's Complaint for Declaratory Judgment until ten (10) days after the mediation, or December 12, 2014.

5. This request for extension of time will not alter any deadline set by the Court and or result in any significant delay in this proceeding. Rather, this request is being made in order to allow the parties time to mediate this case, to conserve judicial resources, and to reduce attorneys' fees and expenses, and not for the purpose of delay or any other improper purpose.

6. The undersigned counsel for Defendant GCAC has conferred with Plaintiff's counsel Christopher P. Leritz, as well as counsel for the co-defendants, who have all indicated that their respective clients do not oppose this motion for an extension for Defendant to answer or otherwise respond to Plaintiff's Complaint for Declaratory Judgment, allowing Defendant GCAC until December 12, 2014 to file its response.

WHEREFORE, Defendant GCAC respectfully requests that this Court extend the time for Defendant to answer or otherwise respond to Plaintiff's Complaint for Declaratory Judgment, up to and including December 12, 2014.

Respectfully Submitted,

HUSCH BLACKWELL LLP

By: /s/ James F. Monafo
James F. Monafo, #38774 MO
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
Phone: 314.480.1500
Fax: 314.480.1505
jim.monafo@huschblackwell.com

*Attorneys for Defendant General Credit Acceptance
Company, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 31st day of October, 2014, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following counsel of record.

Christopher P. Leritz
LERITZ AND PLUNKERT, P.C.
555 Washington Avenue
Suite 600
St. Louis, MO 63101

Attorneys for Plaintiff

Martin L. Daesch
Jesse B. Rochman
SANDBERG PHOENIX & von GONTARD P.C.
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313

*Attorneys for Defendants
David Deaver and Helena Weatherspoon*

/s/ James F. Monfo